

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ERIN ROBERTSON, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

FIDELITY LIFE ASSOCIATION,

Defendant.

Case No. 3:24-cv-00439-ART-CSD

**ORDER TO EXTEND TIME FOR  
DEFENDANT TO REPLY TO  
PLAINTIFF'S RESPONSE TO MOTION  
TO DISMISS THE COMPLAINT (ECF  
NO. 20) - CLASS ACTION**

**(SECOND REQUEST)**

Defendant Fidelity Life Association ("Defendant") and Plaintiff Erin Robertson ("Plaintiff") (together, the "Parties"), by and through their respective counsel, hereby submit the following Stipulation to Extend Time to reply to Plaintiff's Response to Defendant's Motion to Dismiss Complaint ("Response") (ECF No. 20).

WHEREAS, on January 21, 2025, Defendant filed a Motion to Dismiss Plaintiff's Class

1 Action Complaint (“Defendant’s Motion”) (ECF No. 13);

2 WHEREAS, Plaintiff’s deadline to file a Response to Defendant’s Motion was extended  
3 via the Court’s Order granting the Joint Stipulation to Extend Time to Respond (ECF No. 18) to  
4 February 18, 2025 and Defendant’s Reply deadline was extended to February 25, 2025;

5 WHEREAS, counsel for the Parties have conferred and jointly stipulate to extend the  
6 briefing schedule related to Defendant’s Motion by seven (7) days, such that Defendant’s Reply  
7 to Plaintiff’s Response to Defendant’s Motion shall be due by March 4, 2025;

8 WHEREAS, good cause exists for the extension set forth herein as the Parties are  
9 discussing whether the matter may be resolved informally and Defendant requires additional  
10 time to Reply to Plaintiff’s Response;

11 WHEREAS, this is the second extension requested related to Defendant’s Motion and it  
12 is made in good faith and not for purposes of delay.

13 IT IS HEREBY STIPULATED AND AGREED between undersigned counsel for the  
14 Parties, and pending the Court’s approval, that Defendant shall have an additional seven (7) days  
15 to Reply to the Plaintiff’s Response to Defendant’s Motion to Dismiss Complaint (ECF No. 20)  
16 filed in this matter. Defendant’s current Reply deadline is February 25, 2025. With the requested  
17 seven (7) day extension, Defendant’s deadline to Reply to the Response is extended to March 4,  
18 2025.

19 IT IS SO STIPULATED.  
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1 Dated: February 21, 2025

Dated: February 21, 2025

2  
3 By: /s/ James G. Snell

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11 *Attorneys for Defendant*  
12 *FIDELITY LIFE ASSOCIATION*

By: /s/ Mona Amini

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*Attorneys for Plaintiff*  
ERIN ROBERTSON, individually and on  
behalf of all others similarly situated

13 **ORDER**

14 IT IS SO ORDERED.

15 

16 HON. ANNE R. TRAUM  
17 U.S. DISTRICT JUDGE

18 Dated: 2/24/2025

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Perkins Coie LLP and on February 21, 2025, I electronically filed and served the foregoing **JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR DEFENDANT TO REPLY TO PLAINTIFF'S RESPONSE TO MOTION TO DISMISS THE COMPLAINT (ECF NO. 20)** with the United States District Court for the District of Nevada EFile system.

Executed on February 21, 2025, at Palo Alto, California.

/s/ James G. Snell  
James G. Snell